

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>IN RE NATIONAL COLLEGIATE</b>	)	MDL No. 2492
<b>ATHLETIC ASSOCIATION STUDENT-</b>	)	
<b>ATHLETE CONCUSSION INJURY</b>	)	Master Docket No. 1:13-cv-09116
<b>LITIGATION</b>	)	
	)	Judge John Z. Lee
	)	
This Document Relates to All Cases	)	Magistrate Judge Geraldine Soat Brown
	)	
	)	

**JOINT AGREED MOTION FOR 60-DAY STAY**

All parties to this litigation, by and through their attorneys, respectfully request a 60-day stay of the deadlines set forth in the Court's Case Management Order No. 1 (Master Dkt. #15), as amended, including the May 15, 2014 deadlines with respect to the submission of proposed scheduling orders and objections to leadership applications.<sup>1</sup> In support thereof, the parties state as follows:

1. On May 12, 2014, the parties engaged in a mediation with the Hon. Wayne R. Andersen (Ret.) and made continued progress as to resolution of the medical monitoring claims and requests for equitable relief, in addition to discussing the other claims more generally.

2. Due to the complexity of the issues and need for client approval, however, the parties respectfully request a 60-day stay, until July 14, 2014, to resolve all outstanding issues and finalize the settlement. The parties further request that the Court reset the May 29, 2014 case management conference to a status conference. At the May 29, 2014 status conference, the parties will be prepared to fully discuss these matters with the Court.

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<sup>1</sup> The parties respectfully request that the 60-day stay apply to stay a decision on the applications for appointment of Lead Counsel and Liaison Counsel that have been filed.

WHEREFORE, the parties respectfully request that the Court grant this motion, enter a stay of all pending deadlines in these cases through July 14, 2014, reset the May 29, 2014 case management conference to a status conference, and grant such other and further relief as this Court deems appropriate.

Dated: May 13, 2014

Respectfully submitted,

For Plaintiffs:

For the National Collegiate Athletic Association

By: /s/ Steve W. Berman

By: /s/ Mark Mester

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**CERTIFICATE OF SERVICE**

I, Steve W. Berman, an attorney, certify that I filed the Joint Agreed Motion For 60-Day Stay via the court's ECF system, which will serve all counsel of record in the above case.

Dated: May 13, 2014

Respectfully submitted,

By: /s/ Steve W. Berman